

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD OF PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et
al.,

Debtors.

PROMESA
Title III

CASE NO. 17 BK 3283-LTS

RESPONSE TO THE OMNIBUS OBJECTION:
(Re: Docket 7278)

COMES NOW creditor **ESTATE OF DELIA HERNANDEZ**, through the undersigned Law Office, and hereby states and requests as follows:

1. On June 6, 2019, debtor filed the *fiftieth Omnibus Objection* ("FOO") to all deficient Claims not specifically supported with documentation which also failed to provide a basis for asserting a claim against the Commonwealth. See Docket No. 7278.
2. As per such Motion, the deadline for filing a Response is today on or before 4:00pm. See Docket No. 7278-4.
3. The creditor's original proof of claim appears listed in FOO's Exhibit A as claim No. 6918 for \$35,000.00 filed on April 9, 2018. Such claim was filed without supporting documentation and the assistance of any attorney. See Exhibit 1.
4. Accordingly, today, such proof of claim was amended to include the supporting documentation required by the Federal Rules of bankruptcy procedure in order to assert a valid claim against the

Commonwealth. The proof of claim amends the total amount claim from \$35,000.00 to \$18,434.03.

See Proof of Claim No. 2796

5. Let the court take notice that the appearing creditor has duly amended her proof of claim, including, now as requested, the supporting documentation for asserting a claim against the Commonwealth, i.e., CUSIP number (74514LSU2) and other information identifying the bond at issue. Such documentation allows the Debtor to identify the bond issuer and the amounts allegedly at issue as well. *See Proof of Claim, supra.*
6. For all the foregoing reasons, we request to this Honorable Court to deny the Omnibus Objection with respect to the claim of creditor herein, as it has complied with the pertinent information needed to sustain a claim against the debtor.

WHEREFORE, it is respectfully requested that this Honorable Court take notice of the foregoing and deny the Omnibus Objection with respect to the amended Proof of Claim of the Estate of Delia Hernandez

I CERTIFY: That on this same date, a true and exact copy of this notice has been sent to debtor's attorney and parties in interest by CN/ECF electronic filing.

RESPECTFULLY SUBMITTED

In Guaynabo, Puerto Rico this 9th day of July, 2019.

HERNANDEZ-OHARRIZ & SANTIAGO, P.S.C.
Centro Internacional de Mercadeo 1
100 PR-165, Suite 612
Guaynabo, PR 00908
Tel: (787) 378-5630
Fax: (787) 775-1672

By: s/ Edgardo Hernández
Edgardo José Hernández Ohárriz
U.S.D.C. No. 229304
ehernandez@lawservicespr.com